

**UNITED
TECHNOLOGIES
AUTOMOTIVE**1641 Porter Street
Detroit, MI 48216-1984
(313) 962-7311

EPA Region 5 Records Ctr.



338116

VIA AIRBORNE**September 30, 1993**

**Marsha A. Adams
5HSM-5J, Responsible Party Search Section
77 West Jackson Blvd.
Chicago, IL 60604-3590**

**RE: STICKNEY AVENUE LANDFILL AND TYLER STREET DUMP SITES
TOLEDO, OHIO**

Dear Ms. Adams:

Enclosed is the Request for Information Pursuant to Section 104(e) of CERCLA and Section 3007 of RCRA, for the Stickney Avenue Landfill and Tyler Street Dump Sites in Toledo, Ohio.

Please advise if you need any additional information.

Very truly yours,

M. Suzanne Anderson

**M. Suzanne Anderson
Staff Attorney**

enclosure

CC: F. Macielak

RECEIVED
OCT 04 1993

**SUPERFUND PROGRAM
MANAGEMENT BRANCH**

AFFIDAVIT OF PAT F. PERRELLI

I, Pat F. Perrelli, being first duly sworn, on oath, state the following based upon my personal knowledge as described below:

1. That I have been Director of Health, Safety and Environmental Affairs for three and one half years for United Technologies Automotive, Inc. I was formally Manager of Health, Safety and Environmental Affairs for three years for United Technologies Automotive, Inc. - Components Division. My responsibilities include directing environmental activities for North American facilities by supplying guidance, policies, and otherwise assisting facility coordinators.

2. That at my request and under my direction a search has been undertaken of all existing documentation relevant to all United Technologies Automotive, Inc. facilities located in the United States ("said facilities/ plants") regarding the possible use of the Stickney Avenue Landfill and Tyler Street Dump Sites from the time period of 1951-1981.

3. That at my request and under my direction, facility/plant coordinators of said facilities/plants were questioned and asked to review facility/plant records.

4. That at my request and under my direction, any current employees who would have personal knowledge regarding any possible use of the Stickney Avenue Landfill and Tyler Street Dump Sites from the period of 1951-1981 were interviewed.

5. I have determined to the best of my knowledge that, based upon the referenced search of all existing documentation and the referenced inquiries of various facility/plant coordinators and United Technologies Automotive, Inc. current employees, there was never any waste or garbage sent from any of said facilities/plants to the Stickney Avenue Landfill and Tyler Street Dump Site during the time period of 1951-1981.

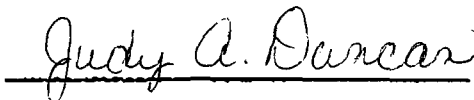
FURTHER AFFIANT SAYETH NAUGHT.



Pat F. Perrelli

United Technologies Automotive, Inc.

Before me, the undersigned, personally appeared Pat F. Perrelli being first duly sworn by me upon her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 30th day of September, 1993.



Notary Public

JUDY A. DUNCAN
Notary Public, Wayne County, MI
My Commission Expires Mar. 3, 1996

RESPONSE OF UNITED TECHNOLOGIES AUTOMOTIVE, INC.
TO EPA REQUEST FOR INFORMATION DATED AUGUST 12, 1993

On August 12, 1993, the United States Environmental Protection Agency ("U.S. EPA"), Region V issued a request for information under Section 104 (e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA") and Section 3007 of the Resource Conservation Recovery Act ("RCRA") regarding the Stickney Avenue Landfill and Tyler Street Dump Sites in Toledo, Ohio. That information request was received by UTA on August 18, 1993. In accordance with the procedures set out in the request, an extension of time was obtained until September 30, 1993.

As you will note, U.S. EPA sent this Information Request to United Technologies Automotive. In order to be most responsive to U.S. EPA, this response to that request is submitted on behalf of both United Technologies Automotive, Inc. and United Technologies Automotive Systems, Inc., (hereinafter "UTA"). Both companies are wholly-owned subsidiaries of United Technologies Corporation (hereinafter "UTC"). Over the years in question, UTC has bought and sold several companies. This fact has complicated our search for information related to use of the Stickney Avenue Landfill and Tyler Street Dump Sites, because facility records are included as part of all divestitures.

UTA's response to the Stickney Avenue Landfill and Tyler Street Dump Site Information Request is as follows:

GENERAL OBJECTIONS

UTA makes the following general objections to the instructions and definitions contained in U.S. EPA's August 12, 1993 Information Request.

UTA objects to Instruction No. 4 to the extent that it purports to place respondent under a continuing obligation to supplement its responses to U.S. EPA if additional information subsequently becomes available to respondent, for the reason that no such continuing obligation is provided for by CERCLA Section 104(e). Without waiving that objection, however, UTA states that it will in good faith attempt to provide U.S. EPA with any additional information responsive to this Information Request which subsequently becomes available to it.

Question 1:

Identify all persons consulted in the preparation of each and every answer to these Information Requests.

Answer:

UTA objects to this question to the extent it requires the identification of "all" persons consulted in the preparation of the answers to this Information Request for the reason that many persons consulted in the preparation of the answers hereto had no knowledge regarding waste disposal activities at the Stickney Avenue Landfill and Tyler Street Dump Sites. Accordingly, identification of those persons would be excessively burdensome, would unnecessarily invade their privacy and would result only in irrelevant and unnecessary information. Without waiving this objection, however, UTA states that the methodology by which UTA responded to this Information Request, and those individuals who participated in preparing this response are described and identified as follows:

M. Suzanne Anderson, Staff Attorney and Pat F. Perrelli, Director of Health, Safety and Environmental Affairs, coordinated this response by contacting the environmental coordinators and individuals responsible for waste and scrap disposal at all UTA manufacturing facilities located in the United States. Ms. Anderson and Mr. Perrelli may be contacted at:

United Technologies Automotive, Inc.
5200 Auto Club Drive
Dearborn, MI 48126
phone no. (313) 593-9639 or
fax no. (313) 441-3444

Question 2:

Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

Answer:

Plant personnel reviewed manifests and waste disposal logs, interviewed relevant personnel, and reviewed purchasing records. None of this documentation or information revealed use of the Stickney Avenue Landfill and Tyler Street Dump Sites. Additionally, copies of these documents would be extremely cumbersome and not relevant to the Information Request since no UTA facilities have used the Stickney Avenue

Landfill and Tyler Street Dump Sites. Therefore, there are no relevant documents to submit.

Question 3:

If Respondent has reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Answer:

UTA is not currently aware of the identity of any person(s) who are able to provide a more detailed or complete response to any Information Request or any person(s) who may be able to provide additional responsive documents.

Question 4:

List the EPA Identification Numbers of the Respondent, if applicable.

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore, this request is not applicable.

Question 5:

Identify the acts or omissions of any person, other than Respondent's employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

Answer:

UTA currently has no information responsive to this Question.

Question 6:

Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of material at the Site.

Answer:

UTA currently has no information responsive to this Question.

Question 7:

Identify all persons, including, but not limited to the Respondent, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site.

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7a:

The persons with whom you or such other persons made such arrangements;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7b:

Every date on which such arrangements took place;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7c:

For each transaction, the nature or the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7d:

The owner of the waste materials or hazardous substances so accepted or transported;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7e:

The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7f:

All tests, analyses, and analytical results concerning the waste materials;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7g:

The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7h:

The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7i:

Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;

Answer:

Not applicable.

Question 7j:

Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7k:

What was actually done to the waste materials or hazardous substances once they were brought to the Site;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7l:

The final disposition of each of the waste materials or hazardous substances involved in such transactions;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7m:

The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substance involved in each transaction.

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7n:

The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7o:

The price paid for (i) transport (ii) disposal or (iii) both of each waste material and hazardous substance.

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7p:

All documents containing information responsive to a-o above or in lieu of identification of all relevant documents, provide copies of all such documents.

Answer:

UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 7q:

All persons with knowledge, information, or documents responsive to a-p above.

Answer:

UTA objects to this question to the extent it requires the identification of "all" persons who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site for the reason that many persons consulted had no knowledge regarding waste disposal activities at the Stickney Avenue Landfill or the Tyler Street Dump Sites. Accordingly, identification of those persons would be excessively burdensome, would unnecessarily invade their privacy and would result only in irrelevant and unnecessary information. See Answer 1.

Additionally, UTA has no records or other information indicating it used the Stickney Avenue Landfill and Tyler Street Dump Sites. Therefore this request is not applicable.

Question 8:

If your waste was not taken to the Stickney Avenue Landfill or the Tyler Street Dump Sites during the period from 1951 to 1981, where were your wastes taken and how were they disposed?

Answer:

UTA objects to this question on the ground that it is overlybroad, unduly burdensome, and is not reasonably calculated to lead to the discovery of relevant information, because it relates to disposal sites other than the Stickney Avenue Landfill and the Tyler Street Dump Sites.

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